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ORIGINAL

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October 12, 2005

James McNulty, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.,  
2nd Floor, 400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105-3265

DOCUMENT  
FOLDER

SECRETARY'S BUREAU

Re: Louise Ogilvie v. AT&T Communications of Pennsylvania, LLC  
Docket No. C-20055304

Dear Secretary McNulty:

On behalf of AT&T Communications of Pennsylvania, LLC, enclosed for filing please find an original and three copies of its Answer to Complaint with regard to the above referenced matter.

Sincerely,



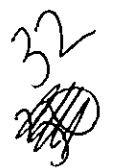
William A. Loy

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

WAL/cll  
Enclosure

cc: Louise Ogilvie (w/ enc.)

HAR:61561.1/ATT004-084497



**ORIGINAL**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SECRETARY'S BUREAU  
OCT 12 PM 3:06

LOUISE OGILVIE

Complainant

v.

Docket No. C-20055304

AT&T COMMUNICATIONS, INC.

Respondent

**DOCUMENT  
FOLDER**

**AT&T COMMUNICATIONS OF PENNSYLVANIA LLC'S  
ANSWER TO COMPLAINT**

AT&T Communications of Pennsylvania LLC ("AT&T") submits this Answer to the Complaint submitted by Ms. Louise Ogilvie on July 11, 2005. In her Complaint, Ms. Ogilvie alleges that she operates a business in Jim Thorpe, Pennsylvania, The Victoriann Bed & Breakfast, and that AT&T improperly disconnected her telephone service which jeopardized her business.

AT&T strictly denies Ms. Ogilvie's allegations that it provided her with inadequate and unreasonable service. Given the circumstances, at all times relevant hereto, AT&T provided adequate and reasonable utility service to Ms. Ogilvie (and The Victoriann Bed & Breakfast). Accordingly, her Complaint should be denied.

In specific support of its answer, AT&T states as follows:

1. On July 11, 2005, Ms. Ogilvie filed a complaint with the Commission against AT&T as captioned above. In her complaint, Ms. Ogilvie alleges that AT&T improperly disconnected her telephone service which jeopardized her business.

2. AT&T strictly denies Ms. Ogilvie's allegations.

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3. At all relevant times, Ms. Ogilvie had two accounts with AT&T: a business account, (570) 325-8107 and an account for her residence, (570) 325-4962.

4. Ms. Ogilvie failed to pay her residence account. AT&T admits that in response to Ms. Ogilvie's failure to pay her residence account, it mistakenly disconnected (570) 325-8107.

5. As soon as the error came to the its attention, AT&T promptly restored Ms. Ogilvie's service. In addition, AT&T issued a goodwill credit of \$332.92 to Ms. Ogilvie's accounts.

6. Further, AT&T strictly denies that it acted unreasonably in responding to a service interruption Ms. Ogilvie alleges occurred on June 16, 2005. Rather, AT&T promptly took the necessary and proper steps to restore Ms. Ogilvie's service.

7. Finally, AT&T strictly denies that it improperly transferred any of Ms. Ogilvie's accounts to a third party.


8. In light of these circumstances, AT&T has at all relevant times provided Ms. Ogilvie with reasonable service at just and reasonable rates.

9. Even if AT&T provided Ms. Ogilvie with less than reasonable service -- which it has not done here -- the Commission is without authority to award Ms. Ogilvie damages for her time, loss of business, loss of reputation or emotional distress.

10. Overall, the complaint is without merit and should be denied.

WHEREFORE, for all of the foregoing reasons, AT&T requests that the instant complaint be dismissed.

Respectfully submitted,

  
\_\_\_\_\_  
William A. Loy, Esq.  
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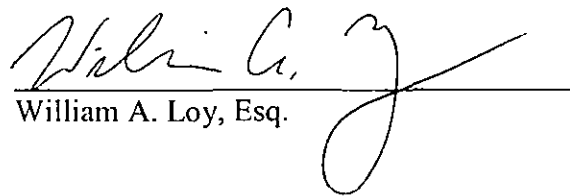
Of Counsel:  
Robert C. Barber, Esq.  
AT&T Communications of Pennsylvania LLC  
3033 Chain Bridge Rd., Rm. 3-D  
Oakton, VA 22185

Dated: October 12, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code Section 1.54 of the Commission's rules:

Louise Ogilvie  
68 Broadway  
Jim Thorpe, PA 18229

  
William A. Loy, Esq.

Date: October 12, 2005

SECRETARY'S BUREAU  
OCT 12 2005